Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of: RM-11306

I am opposed to this for the following reasons:

1. The ARRL states that the purpose for this petition is to "encourage the implementation of new technologies" (Petition for Rule Making, page 2). However, this is already permitted under 97.309 (b).

2. The ARRL states "We are in the early stages of a dramatic shift in Amateur operating patterns …" (page 3). However, there is no evidence offered to substantiate this.

3. The ARRL states "In summary, there is a need to permit higher speed digital communications in the bands between 1.8 and 450 MHz…" (page 9), but has not provided evidence in support of this.

4. On page 3, the ARRL states "Responsibility for resolving conflicts in shared spectrum must be shouldered by the Amateur community itself. Voluntary band planning must be adequate and must gain broad acceptance by amateurs as the best means of protecting their individual interests. Traditionally, these cooperative methods have worked satisfactorily." On page 9, the ARRL states "Because there is a strong tradition in the United States of restricting sub bands by rule rather than purely through voluntary band plans, complete elimination of regulatory band segments and complete reliance on informal band planning does not appear to be a suitable option in the United States." These two statements are in complete disagreement with each other.

5. In footnote 12, page 11, the ARRL states: "Nor is the proposal a means of expanding telephony sub bands. The specification of bandwidth only will have the regulatory effect of permitting telephony operation in, for example, the 14.100-14.150 MHz segment and the 10.135-10.150 MHz segment, where presently, it is not permitted by rule. However, it is not the ARRL's intent to encourage telephony operation in those segments. Rather, such matters should be regulated by voluntary band planning." Once again, this is contradicted by their statement referred to at the end of my point 4. If voice transmissions are not prohibited by regulation in those segments, voluntary band planning will not be effective.

6. On page 12, the ARRL states "Again, this is based on the principle that accommodation of new technologies should not be at the expense of currently used operating modes." However, at least one mode will suffer because of this. BAUDOT RTTY, 60 wpm, 170 Hz shift (hereinafter referred to as RTTY) will lose large amounts of spectrum. Using 20 Meters as an example, RTTY will not be allowed below 14.065 MHz. During normal day-to-day operations this would not be much of a problem. However, during a contest weekend, this part of the spectrum is commonly used by RTTY operators. During the 2006 ARRL RTTY Roundup contest, some bands were very crowded with RTTY signals. Under this rule, the congestion would be much worse.

7. Along these same lines, DX stations use this part of the band below 14.065, and in some cases are required to do so by regulations in their country. Under these proposed rules, it would be necessary for US stations to operate split frequency to work these stations. This would be an inefficient use of spectrum. While I have used 20 Meters as the example in points 7 and 8, the same principle applies to other bands.

8. The ARRL proposes to allow stations under semi-automatic control to be used "throughout the amateur HF bands" (page 14). This appears to greatly increase the amount of spectrum given to these stations, while greatly decreasing that given to RTTY stations. Stations under semi-automatic control can still cause a great deal of interference. For example, the control operator on one end of the path might not hear other stations that would be interfered with by the station on the other end of the path. I question whether any kind of automatic or semi-automatic control serves a useful purpose in the HF bands.

9. Wide bandwidth signals should not be allowed in the 30 Meter band. This is a very narrow band, and is better suited for narrow bandwidths.

10. There is no need to increase the spectrum allotted to wide bandwidth signals at HF, at least not to the extent proposed by the ARRL.

11. The ARRL states "This petition does not favor one mode at the expense of another." However, the petition greatly reduces the usable spectrum for RTTY operations, while double-sideband AM emissions, which use much more spectrum, are not restricted.

12. Depending on how the frequency chart submitted by the ARRL is interpreted, digital signals would be allowed all the way to the top of the phone bands.

13. There is no need for two narrow bandwidth sub bands on HF. If the FCC decides to divide the bands by bandwidth, then there should only be one narrow bandwidth – a minimum of 500 Hz.

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